

APPENDIX 2

This Appendix identifies the Non-Counterparty Claims that are the subject of Defendants' motion to dismiss or as to which Defendants oppose leave to amend and the Defendants that challenge jurisdiction as to each of those claims in their entirety.¹

Action	Non-Counterparty Claims	Defendants Challenging Jurisdiction
<i>Federal Deposit Insurance Corporation as Receiver for Amcore Bank, N.A., et al. v. Bank of America Corporation, et al.</i> No. 14-cv-01757, Dkt. No. 253 Ex. A Proposed Second Amended Complaint	Count XIII: Fraud Based on: (i) Alleged Misrepresentations in USD bbaLIBOR™ Submissions; (ii) Alleged Misrepresentations Regarding USD bbaLIBOR™; (iii) Alleged Misrepresentations by BBA ²	Merrill Lynch International Bank Ltd. Barclays Bank PLC British Bankers' Association BBA Enterprises Ltd. BBA Trent Ltd. (f/k/a BBA LIBOR Ltd.)
	Count XIV: Aiding and Abetting Fraud	Coöperatieve Rabobank U.A. Credit Suisse AG Credit Suisse International Deutsche Bank AG HSBC Bank plc
	Count XV: Civil Conspiracy to Commit Fraud	The Hongkong and Shanghai Banking Corporation Ltd. J.P. Morgan Dublin plc J.P. Morgan Markets Limited Bank of Scotland plc Lloyds Banking Group plc
	Count XVI: Negligent Misrepresentation Based on: (i) Alleged Misrepresentations in USD bbaLIBOR™ Submissions; (ii) Alleged Misrepresentations Regarding USD bbaLIBOR™; (iii) Alleged Misrepresentations by BBA	Lloyds Bank plc The Norinchukin Bank Portigon AG (f/k/a WestLB AG) Royal Bank of Canada The Royal Bank of Scotland plc Société Générale

¹ To the extent any other claim asserted by Plaintiffs is a Non-Counterparty Claim, those claims should also be dismissed for lack of personal jurisdiction for the same reasons as the Non-Counterparty Claims identified herein.

² To the extent certain Plaintiffs have identified a subsection in their complaints or proposed amended complaints regarding alleged misrepresentations by the BBA, those Plaintiffs have failed to assert any fraud-related claims that are not subsumed by alleged misrepresentations regarding LIBOR. Defendants challenge jurisdiction regarding alleged misrepresentations by the BBA consistent with such challenges to alleged misrepresentations regarding LIBOR. Each Defendant challenging jurisdiction as to any Non-Counterparty Claim identified herein does so to the extent that such Non-Counterparty Claim is asserted against that Defendant.

Action	Non-Counterparty Claims	Defendants Challenging Jurisdiction
	Count XVII: Tortious Interference with Contract	The Bank of Tokyo-Mitsubishi UFJ, Ltd. UBS AG
	Count XVIII: Aiding and Abetting Tortious Interference with Contract	
	Count XIX: Civil Conspiracy to Commit Tortious Interference with Contract	
	Count XX: Tortious Interference with Prospective Economic Advantage	
	Count XXI: Aiding and Abetting Tortious Interference with Prospective Economic Advantage	
	Count XXII: Civil Conspiracy to Commit Tortious Interference with prospective Economic Advantage	
	Count XXIII: Violations of Sherman Act Section 1	
	Count XXIV: Violations of the Donnelly Act	

Action	Non-Counterparty Claims	Defendants Challenging Jurisdiction
<i>Federal Deposit Insurance Corporation as Receiver for Doral Bank v. Bank of America, N.A., et al.</i> 18-cv-01540, Dkt. No. 1 Complaint	Count III: Fraud Based on: (i) Alleged Misrepresentations in USD bbaLIBOR™ Submissions; (ii) Alleged Misrepresentations Regarding USD bbaLIBOR™; (iii) Alleged Misrepresentations by BBA	Barclays Bank PLC British Bankers' Association BBA Enterprises Ltd. BBA Trent Ltd. (f/k/a BBA LIBOR Ltd.) Coöperatieve Rabobank U.A. Credit Suisse AG Credit Suisse International Deutsche Bank AG HSBC Bank plc Bank of Scotland plc Lloyds Banking Group plc Lloyds Bank plc The Norinchukin Bank Portigon AG (f/k/a WestLB AG) Royal Bank of Canada The Royal Bank of Scotland plc Société Générale The Bank of Tokyo-Mitsubishi UFJ, Ltd. UBS AG
	Count IV: Aiding and Abetting Fraud	
	Count V: Civil Conspiracy to Commit Fraud	
	Count VI: Negligent Misrepresentation Based on: (i) Alleged Misrepresentations in USD bbaLIBOR™ Submissions; (ii) Alleged Misrepresentations Regarding USD bbaLIBOR™; (iii) Alleged Misrepresentations by BBA	
	Count VII: Tortious Interference with Contract	
	Count VIII: Aiding and Abetting Tortious Interference with Contract	
	Count IX: Civil Conspiracy to Commit Tortious Interference with Contract	

Action	Non-Counterparty Claims	Defendants Challenging Jurisdiction
	Count X: Tortious Interference with Prospective Economic Advantage	
	Count XI: Aiding and Abetting Tortious Interference with Prospective Economic Advantage	
	Count XII: Civil Conspiracy to Commit Tortious Interference with prospective Economic Advantage	
	Count XIII: Violations of Sherman Act Section 1	
	Count XIV: Violations of the Donnelly Act	
<i>Principal Financial Group, Inc. v. Bank of America Corporation, et al.</i> No. 13-cv-6014, Dkt. No. 255 Ex. A Proposed Second Amended Complaint	Count I: Violation of Section 1 of the Sherman Act (15 U.S.C. § 1)	Bank of America Corporation Bank of America, N.A. Merrill Lynch Capital Services, Inc. Barclays Bank PLC Barclays Capital Inc. British Bankers' Association BBA Enterprises Ltd. BBA Trent Ltd. (f/k/a BBA LIBOR Ltd.) Citibank, N.A. Citigroup Inc. Citigroup Global Markets Inc. Coöperatieve Rabobank U.A. Credit Suisse AG Credit Suisse Group AG Credit Suisse Securities (USA) LLC
	Count II: Violation of the Donnelly Act (N.Y. Gen. Bus. Law § 340)	
	Count V: Fraud Based on: (i) Alleged Misrepresentations in USD bbaLIBOR™ Submissions; (ii) Alleged Misrepresentations Regarding USD bbaLIBOR™; (iii) Alleged Misrepresentations by BBA	
	Count VI: Aiding and Abetting Fraud	

Action	Non-Counterparty Claims	Defendants Challenging Jurisdiction
		Credit Suisse International Deutsche Bank AG Deutsche Bank Securities, Inc. Chase Bank USA, N.A. JPMorgan Chase & Co. JPMorgan Chase Bank, N.A. J.P. Morgan Dublin plc HBOS plc Lloyds Banking Group plc Lloyds Bank plc Royal Bank of Canada The Royal Bank of Scotland Group plc The Royal Bank of Scotland plc UBS AG UBS Securities LLC
<i>Principal Funds, Inc. v. Bank of America Corporation, et al.</i> No. 13-cv-6013, Dkt. No. 247 Ex. A Proposed Second Amended Complaint	Count I: Violation of Section 1 of the Sherman Act (15 U.S.C. § 1)	Bank of America Corporation Bank of America, N.A. Barclays Bank PLC Barclays Capital Inc. British Bankers' Association BBA Enterprises Ltd. BBA Trent Ltd. (f/k/a BBA LIBOR Ltd.) Citibank, N.A. Citigroup Inc. Citigroup Global Markets Inc. Coöperatieve Rabobank U.A. Credit Suisse AG Credit Suisse Group AG Credit Suisse Securities (USA) LLC Deutsche Bank AG Deutsche Bank Securities, Inc. JPMorgan Chase & Co. JPMorgan Chase Bank, N.A. HBOS plc Lloyds Banking Group plc Lloyds Bank plc Royal Bank of Canada The Royal Bank of Scotland Group plc The Royal Bank of Scotland plc
	Count II: Violation of the Donnelly Act (N.Y. Gen. Bus. Law § 340)	
	Count V: Fraud Based on: (i) Alleged Misrepresentations in USD bbaLIBOR™ Submissions; (ii) Alleged Misrepresentations Regarding USD bbaLIBOR™; (iii) Alleged Misrepresentations by BBA	
	Count VI: Aiding and Abetting Fraud	

Action	Non-Counterparty Claims	Defendants Challenging Jurisdiction
		UBS AG UBS Securities LLC
<i>The Federal Home Loan Mortgage Corporation v. Bank of America Corp., et al.</i> No. 13-cv-03952, Dkt. No. 295 Ex. A Proposed Third Amended Complaint	Count I: Violations of Sherman Act Section 1	Bank of America Corporation Bank of America, N.A. Barclays Bank PLC Barclays Capital Inc. British Bankers' Association BBA Enterprises Ltd. BBA Trent Ltd. (f/k/a BBA LIBOR Ltd.) Citibank, N.A. Citigroup Inc. Coöperatieve Rabobank U.A. Credit Suisse AG Credit Suisse International Deutsche Bank AG HSBC Bank plc JPMorgan Chase & Co. JPMorgan Chase Bank, N.A. Bank of Scotland plc Lloyds Banking Group plc Lloyds Bank plc The Norinchukin Bank Portigon AG (f/k/a WestLB AG) Royal Bank of Canada The Royal Bank of Scotland Group plc The Royal Bank of Scotland plc Société Générale The Bank of Tokyo-Mitsubishi UFJ, Ltd. UBS AG
	Count X: Fraud Based on: (i) Alleged Misrepresentations in USD bbaLIBOR™ Submissions; (ii) Alleged Misrepresentations Regarding USD bbaLIBOR™; (iii) Alleged Misrepresentations by BBA	
	Count XI: Tortious Interference with Contract	
<i>The Charles Schwab Corporation et al. v. Bank of America Corporation et al.</i> 11-md-2262, Dkt. No. 2578 (Individual Case No. 13-cv-7005)	Count I: Violation of Section 10(b) of the Exchange Act, 15 U.S.C. § 78j(b), and SEC Rule 10b-5 Promulgated Thereunder, 17 C.F.R. § 240.10b-5 Based on Alleged Misrepresentations in USD bbaLIBOR™ Submissions	Bank of America Corporation Bank of America, N.A. Barclays Bank PLC Citibank, N.A. Citigroup Inc. Coöperatieve Rabobank U.A. Credit Suisse AG Credit Suisse Group AG

Action	Non-Counterparty Claims	Defendants Challenging Jurisdiction
Second Amended Complaint	Count II: Violation of Section 20(a) of the Exchange Act, 15 U.S.C. § 78t(a) ³	Deutsche Bank AG HSBC Holdings plc HSBC Bank plc JPMorgan Chase & Co. JPMorgan Chase Bank, N.A. Bank of Scotland plc HBOS plc
	Count III: Fraud, Deceit, and Concealment Based on Alleged Misrepresentations in USD bbaLIBOR™ Submissions	Lloyds Banking Group plc Lloyds Bank plc The Norinchukin Bank Portigon AG (f/k/a WestLB AG)
	Count IV: Aiding and Abetting Fraud	Westdeutsche ImmobilienBank AG Royal Bank of Canada The Royal Bank of Scotland Group plc The Royal Bank of Scotland plc The Bank of Tokyo-Mitsubishi UFJ, Ltd. UBS AG
	Count VI: Tortious Interference with Contract	
<i>National Credit Union Administration Board v. Credit Suisse Group AG, et al.</i> 13-cv-7394, Dkt. No. 245 Second Amended Complaint	Count I: Violation of Section 1 of the Sherman Act	Bank of America Corporation Bank of America, N.A. Barclays Bank PLC Barclays Capital Inc. Citigroup Inc. Citibank, N.A. Citigroup Financial Products Inc. Citi Swapco Inc.
	Count II: Violation of State Antitrust, Unfair Competition, and Restraint of Trade Laws	Coöperatieve Rabobank U.A. Credit Suisse Group AG Deutsche Bank AG HSBC Holdings plc HSBC Bank USA, N.A.
	Count VII: Tortious Interference with the Credit Unions' Contracts with Other Defendants and Third Parties	

³ By joining this Appendix, Defendants do not concede that a particular claim is being asserted against them and those Defendants who have not joined reserve the right to supplement this Appendix.

Action	Non-Counterparty Claims	Defendants Challenging Jurisdiction
	Count VIII: Tortious Interference with the Credit Unions' Prospective Economic Advantage	JPMorgan Chase & Co. JPMorgan Chase Bank, N.A. HBOS plc Lloyds Banking Group plc The Norinchukin Bank Portigon AG (f/k/a WestLB AG) Westdeutsche ImmobilienBank AG Royal Bank of Canada The Royal Bank of Scotland Group plc Société Générale The Bank of Tokyo-Mitsubishi UFJ, Ltd. UBS AG